

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KING COUNTY, WASHINGTON,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

IKB DEUTSCHE INDUSTRIEBANK AG, et al.,

Defendants.

Civil Action No. 1:09-cv-08387-SAS
ECF Case

CLASS ACTION

IOWA STUDENT LOAN LIQUIDITY
CORPORATION, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

IKB DEUTSCHE INDUSTRIEBANK AG, et al.

Defendants.

Civil Action No. 1:09-cv-08822-SAS
ECF Case

CLASS ACTION

**NOTICE OF MOTION OF DEFENDANTS IKB DEUTSCHE INDUSTRIEBANK AG
AND IKB CREDIT ASSET MANAGEMENT GMBH TO DISMISS THE
COMPLAINTS UNDER RULES 9(B) AND 12(B)(6) OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

PLEASE TAKE NOTICE that Defendants IKB Deutsche Industriebank AG and IKB Credit Asset Management GmbH, upon the accompanying Memorandum of Law in Support of Their Motion to Dismiss the Complaints Under Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure and the Declaration of Zachary D. Rosenbaum, with attached exhibits, will move, through their undersigned counsel, before the Honorable Shira A. Scheindlin, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15C, New York, New York 10007, at such date as the Court will determine, for an

Order granting their Motion to Dismiss the Complaint filed by Plaintiff King County, Washington and the Complaint filed by Plaintiff Iowa Student Loan Liquidity Corporation for failure to state a claim upon which relief can be granted and lack of standing pursuant to Federal Rule of Civil Procedure 12(b)(6) and for failure to plead fraud with particularity pursuant to Federal Rule of Civil Procedure 9(b).

Dated: February 3, 2010
New York, New York

LOWENSTEIN SANDLER PC

By: s/ John J.D. McFerrin-Clancy

Zachary D. Rosenbaum
John J.D. McFerrin-Clancy
Thomas E. Redburn, Jr.
Jennifer J. McGruther
1251 Avenue of the Americas
New York, New York 10020
Tel.: 212.262.6700
Fax: 212.262.7402
-and-
65 Livingston Avenue
Roseland, New Jersey 07068
Tel.: 973.597.2500
Fax: 973.597.2400
zrosenbaum@lowenstein.com
jmcFerrin-clancy@lowenstein.com
tredburn@lowenstein.com
jmcgruther@lowenstein.com

*Attorneys for Defendants
IKB Deutsche Industriebank AG and
IKB Credit Asset Management
GmbH*